

Before the Federal Communications Commission Washington, DC 20554

In the matter of
Primary Status for Amateur Radio Operation
on the Band Segment 2300 to 2305 MHz

RM-10165 & RM-10166

Comments of the
Central States VHF Society

The Central States VHF Society (CSVHFS) is an organization of active VHF, UHF and microwave experimentally minded radio amateurs. The society's goal is to encourage and promote the use of all the amateur radio allocations above 50 MHz. It is particularly interested in increasing operation on the microwave bands above 902 MHz. Many of its members are already operational around the weak signal rallying frequency of 2304 MHz, using equipment and techniques permitting communication over considerable ranges. Some of our members are also capable of Earth-Moon-Earth (EME) operation on this band. All who operate this band, whether terrestrial-only or both terrestrial and EME, have invested substantial sums of money and considerable amounts of time and effort into building stations which are effective in this frequency range. This includes installation of relatively high power amplifiers, high gain antennas and low noise receivers. In many cases, the microwave portion of the equipment is located on high towers near the antenna in order to avoid losses associated with long transmission lines. This makes modification of the equipment, such as would be required if a move to a nearby band segment should become necessary, expensive and difficult.

To facilitate the kinds of operation conducted in the 2300 to 2305 MHz segment by CSVHF members and many other licensed amateurs, it is necessary to minimize interference, i.e. preserve a low noise floor.

The CSVHFS feels that the 2300 to 2305 MHz segment is vital to the future development of microwave activity by radio amateurs. Contributing to this will be the increasing use and availability of equipment and expertise in that portion of the radio spectrum brought on by the presence of amateur satellite transponders operating in the vicinity of 2400 MHz. The best way to preserve the 2300 to 2305 MHz segment for such future development by radio amateurs is by raising its status from Secondary to Primary, as urged by ARRL; and denying all efforts to introduce other services into it, such as proposed by AeroAstro.

For the reasons cited above, CSVHFS strongly supports the Petition for Rulemaking submitted May 7, 2001 by the American Radio Relay League (ARRL), designated RM-10165 to raise the status of the 2300 to 2305 MHz segment from Secondary to Primary, and strongly opposes the April 8, 2001 Petition submitted by AeroAstro Inc. designated RM-10166, which would introduce a significant amount of interference into the band and potentially place severe limitations on amateur operation in it.

Therefore, the CSVHFS urges the Commission to adopt the ARRL proposal (RM-10165) and reject that of AeroAstro (RM-10166).

Respectfully submitted:

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President

